

# West Alabama Bank

February 16, 2011

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW.  
Washington, DC 20551

Re: Docket No. R-1404 and RIN No. 7100 AD63

I am writing to express my opposition to the proposed "Debit Card Interchange Fees and Routing" rule. As City President of West Alabama Bank in Millport, Alabama, I feel that the safe harbor provides no protection to small issuers from market forces. I believe the price differential between cards will give merchants a strong incentive to steer customers to use cards of the larger institutions and to partner with large institutions to move their accounts to the larger institutions. We are located in a rural area of Lamar County, where our low to moderate income customers will find it more difficult to maintain a bank account. Our bank takes pride in being a community oriented bank and I believe a large number of our customers will have to turn to more expensive, less convenient, non-traditional banking services.

It is also my opinion, that the Board should adopt alternative A in implementing the routing requirement. The alternative limits the expense of managing unneeded relationships with additional networks and increases the number of PIN network routes available for merchants.

Thank you,



Pam Nichols, VP  
West Alabama Bank  
Millport, Alabama

